

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JANE DOE, on behalf of JOHN DOE, her
minor child,

Plaintiff,

v.

MARTY SMALL, SR., in his official
capacity as Mayor of Atlantic City, New
Jersey, and individually,

LA'QUETTA SMALL, in her official
capacity as Former Principal of Pennsylvania
Avenue School, and individually,

BARRY CALDWELL, in his official
capacity as current Superintendent of the
Atlantic City School District,

PAUL A. SPAVENTA, in his official
capacity as former Interim Superintendent of
the Atlantic City School District,

ATLANTIC CITY BOARD OF
EDUCATION, a public entity, and

KAYAN AHMED FRAZIER, an individual,

Defendants.

Civil Action No.: 1:21-cv-11189

**REQUEST TO ENTER DEFAULT AS TO
DEFENDANT, ATLANTIC CITY
BOARD OF EDUCATION**

TO CLERK:

Please enter upon the docket the default of the Defendant, Barry Caldwell, in the
above-entitled action for failure to plead or otherwise defend as provided by the rules of the

Court or by an Order of this Court, or because the Answer of the Defendant has been stricken.

LENTO LAW GROUP, P.C.



TERRELL A. RATLIFF, ESQUIRE

NJ State Bar No. 017852011

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Attorney for Plaintiff

TRIAL COUNSEL

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JANE DOE, on behalf of JOHN DOE, her
minor child,

Plaintiff,

v.

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Defendants.

Civil Action No.: 1:21-cv-11189

**CERTIFICATION IN SUPPORT OF
REQUEST TO ENTER DEFAULT
AGAINST DEFENDANT,
ATLANTIC CITY BOARD OF
EDUCATION**

I, Terrell A. Ratliff, Esquire, certifies as follows:

1. I am the attorney for the Plaintiff, Jane Doe on behalf of John Doe, her minor child.
2. The Complaint and Summons in this action were served upon the Defendant, Atlantic City Board of Education, as appears from the Affidavit of Service filed with the Court. See attached Exhibit "A".
3. The Defendant, Atlantic City Board of Education, has failed to answer the Complaint in this matter and the Defendant, Barry Caldwell, has not otherwise moved for an extension to Answer.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

LENTO LAW GROUP, P.C.



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Attorney for Plaintiff

TRIAL COUNSEL

EXHIBIT “A”

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JANE DOE,
Plaintiff

V.

SUMMONS IN A CIVIL CASE

MARTY SMALL, SR, ET AL.,
Defendant

CASE
NUMBER: **1:21-CV-11189-RMB-SAK**

TO: *(Name and address of Defendant):*

Atlantic City Board of Education
1300 Atlantic Avenue
Atlantic City, New Jersey 08401

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States Agency, or an office or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

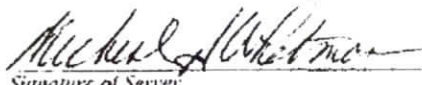
**Lento Law Group
3000 Atrium Way
Suite 200
Mt. Laurel, New Jersey 08054**

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

s/ WILLIAM T. WALSH
CLERK



ISSUED ON 2021-05-13 17:04:55. Clerk
USDC NJD

RETURN OF SERVICE		
Service of the Summons and complaint was made by (print)	DATE	6/3/2021
NAME OF SERVER (PRINT)	TITLE	MICHAEL WHITMAN Courier
Check one box below to indicate appropriate method of service		
<p>Served personally upon the defendant. Place where served: <u>1300 ATLANTIC AVE</u> <u>ATLANTIC CITY NJ</u></p> <p>Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.</p> <p>Name of person with whom the summons and complaint were left: <u>Rosalind (Security)</u></p> <p>Returned unexecuted: _____</p> <p>Other (specify): _____</p>		
STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL
DECLARATION OF SERVER		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.</p>		
Executed on	6/13/2021 Date	 Signature of Server
<p style="text-align: center;">Address of Server</p> <p style="text-align: center;">Road Runner Courier Service Inc. 708 E Main Street Moorestown NJ 08057</p>		



ROAD RUNNER

COURIER SERVICE, INC.

708 E. MAIN STREET, MOORESTOWN, NJ 08057

Office: (856) 428-7500 • Fax: (856) 428-7510

Web: roadrunner1st.com

Docket # 1:21-cv-11189

Case Name: Dee v. Small, Sr et al

Summons & Complaint

6/15/21
Date

Atlantic City Board of Ed
Place (Name & Address)

Michael J. Small
Served On (Print Name & Title)

(Security) - Mail delivery
(Manner of Service)

Michael J. Small
Served by (Print Name)

Owner
Title:

DECLARATION OF SERVER

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made are willfully false, I am subject to punishment.

Executed on : 6/15/21

Signature of Server: Michael J. Small

708 E. Main Street
Moorestown, NJ 08057



2000 Market Street, Suite 1300
Philadelphia, PA 19103

T (215) 972-7900
F (215) 564-7699

July 2, 2021

Via Email: attorneypath@gmail.com

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Joseph D. Lento, Esquire
Lento Law Group, P.C.
3000 Atrium Way, Suite 200
Mount Laurel, NJ 08054

RE: The Estate of Brian D. Koukoui, Zakkaht Koukoui, and Ayaht Koukoui
Date of Loss: February 7, 2021
Our File Number: 0113661

Dear Ms. Horner and Mr. Lento:

As you are aware, we have been retained to protect the interests of J.B. Hunt Transport Services, Inc. in the above-referenced accident.

Kindly be advised that the J.B. Hunt equipment was produced for inspection on June 16, 2021. At this time the equipment will be salvaged, repaired, or placed back into service.

Thank you for your attention to this matter.

Very truly yours,

/s/ James A. Wescoe

James A. Wescoe

JAW/las

cc: James DeCinti, Esquire (via email)

CERTIFICATION

I hereby certify that the foregoing Answers to Interrogatories made by me are true.

I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated:

Ines Mrabet